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January 6, 2009

Via ECFS

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

Re: CPNI Certification and Accompanying Statement EB Docket No. 06-36

Dear Ms. Dortch:

Siskiyou Long Distance ("Siskiyou"), by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its annual CPNI certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Marjorie Spivak

cc: Telecommunications Consumers Division, Enforcement Bureau Best Copy and Printing, Inc.

Attachments

Phone (530) 467-6000 • Fax (530) 467-6401

CPNI Corporate Certification

Required Annually

I, James T. Lowers, am a corporate officer of Siskiyou Long Distance ("Siskiyou"). Pursuant to FCC Rule Section 64.2009(e), I hereby certify that I have personal knowledge that Siskiyou has established operating procedures that are adequate to ensure compliance with the FCC's CPNI Rules. Siskiyou's CPNI Policy Statement is attached. The Policy Statement explains how Siskiyou's operating procedures ensure compliance with the FCC's CPNI rules contained in Part 64, Subpart U.

Signed Same T-Lowers

Dated 1-05-09



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CPNI Usage Policy Statement

Pursuant to Section 64.2009(e) of the Federal Communications Commission's ("FCC") rules, this statement explains how the operating procedures of Siskiyou Long Distance ensure compliance with Part 64, Subpart U of the FCC's rules.

- 1. The Company has chosen to prohibit the use of CPNI for marketing purposes by itself and between its affiliates.
- 2. The Company's CPNI Policy Manual includes an explanation of what CPNI is and when it may be used without customer approval.
- 3. Employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI. The Company's CPNI Policy Manual describes the disciplinary process related to noncompliance with CPNI obligations, and sets forth the penalties for non-compliance, which can include termination of employment.
- 4. The Company has established a supervisory review process regarding Company compliance with the FCC's CPNI rules.
- 5. The Company requires affirmative written/electronic subscriber approval for the release of CPNI to third parties.
- 6. A Corporate Officer has been named as the CPNI Compliance Officer and is held responsible for annually certifying that the Company is in compliance with the FCC's CPNI rules and submitting to the FCC, on or prior to March 1st of each year, the certification and an accompanying statement explaining how the Company complies with the FCC's CPNI rules.
- 7. The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company has safeguards in place to protect against unauthorized access to CPNI. The Company authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact or an in-store visit.
- 8. The Company does not provide customers with online account access.
- 9. The Company does not disclose call detail information over the telephone, based on customer-initiated telephone contact. The Company only discloses call detail information by sending it to the address of record or by calling the customer at the telephone number of record. If the customer is able to provide call detail information during a customer-initiated call without Company's assistance, then the Company is permitted to discuss the call detail information



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provided by the customer.

- 10. The Company provides customers with access to CPNI at a Company retail location if the customer presents a valid photo ID and the valid photo ID matches the name on the account.
- 11. The Company has procedures and policies in place to notify a customer immediately when an address of record is created or changed.
- 12. In the event of a CPNI breach, the Company complies with the FCC's rules regarding notice to law enforcement and customers. The Company maintains records of any discovered breaches and notifications to the United States Secret Service (USSS) and the FBI regarding those breaches, as well as the USSS and the FBI responses to the notifications for a period of at least two years.
- 13. The Company did not take action against data brokers or receive any customer complaints during the previous calendar year (or in the current year as of the date of this filing) concerning the unauthorized release of CPNI.